REMARKS

Claims 2-15 and 17-30 are pending in this application. By this Amendment, claims 2, 6, 7, 8, 14, 17, 21, 22, 23, 29 and 30 are amended, and claims 1 and 16 are cancelled without prejudice to or disclaimer of the subject matter contained therein, and rejoinder of withdrawn non-elected-dependent claims 3, 4, 11, 12, 18, 19, 26 and 27 upon allowance of independent claims 2, 8, 17 and 23 is respectfully requested. Reconsideration of the application is respectfully requested.

Claims 1, 2, 5-10, 13-17, 20-25 and 28-30 are rejected under 35 U.S.C. §102(e) over U.S. Patent No. 6,697,107 to Hamilton, Jr. et al (Hamilton). The rejection of claims 1 and 16 is rendered moot by the cancellation of those claims. The rejection of the remaining claims is respectfully traversed for at least the following reasons.

Hamilton discloses smoothing a digital color image after classifying pixels into five groups based on similarity degrees in four directions (horz, vert, diag1, and diag2). Thus, for example, because the pixels are classified into only five groups, the edges in the diagonal direction may not be preserved, especially in the four directions (HV [i, j], DN [i, j]) = (1,1), (1, -1), (-1, 1) and (-1, -1). The combination of features recited in independent claims 2, 8, 17 and 23 are patentable over the method/apparatus of Hamilton at least because claims 2, 8, 17 and 23 recite classifying pixels into one of nine or more groups. Thus, the method or apparatus recited in each of claims 2, 8, 17 and 23 is advantageous over Hamilton at least because smoothing can be performed while preserving the edges in, for example, more than four directions.

Applicants respectfully submit that Hamilton fails to disclose or suggest the combinations of features respectively recited in each of amended independent claims 2, 8, 17 and 23 including, *inter alia*, a classifying means or step for classifying pixels whose similarity degrees have been calculated by the similarity degree calculating means or step into one of

nine or more groups having different similarity features; and a smoothing means or step for selecting a pixel to be subjected to smoothing from among a pixel that has been classified into a particular one of the nine or more groups and pixels in a vicinity of the pixel that has been classified into the particular group.

For at least these reasons, Applicants respectfully submit that Hamilton fails to disclose or suggest all the features of claims 2, 8, 17 and 23, as well as all the features of claims 3-7, 9-15, 18-22 and 24-30, which respectively depend from claims 2, 8, 17 and 23. It is respectfully requested that the rejection be withdrawn.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of all pending claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

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